

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

DAVID WHITT,

PLAINTIFF,

v.

CITY OF ST. LOUIS, et al.,

DEFENDANT.

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Case No. 4:18-CV-01294

**CONSENT MOTION FOR EXTENSION
OF TIME TO ANSWER OR OTHERWISE PLEAD**

COME NOW Defendants Officer Ryan J. Linhorst, Sergeant Matthew T. Karnowski, and Officer Matthew A. Shaw (collectively “Defendants”), and move for an extension of time of 30 days, up to and including October 5, 2018, within which to answer or otherwise plead. In support, Defendants state as follows:

1. Plaintiff’s Complaint was filed in this District Court on August 7, 2018. (Doc. 1).

2. The St. Louis City Counselor’s Office accepted service on behalf of Defendant City of St. Louis on August 13, 2018. (Doc 5). Its answer is due on September 4, 2018.

3. The St. Louis Metropolitan Police Department accepted service on behalf of Defendants Linhorst, Karnowski, Shaw, and Baine on August 15, 2018. (Doc. 5). Their answers are due on September 5, 2018.

4. In order to represent individually named defendants from the Metropolitan Police Department, the City Counselor’s Office must first obtain approval from the Chief of Police.

5. The Chief of Police has approved the City Counselor's representation of Defendant Baine.

6. The Chief of Police has yet to approve the City Counselor's representation of Defendants Linhorst, Karnowski, and Shaw.

7. Defendants require additional time for the Chief of Police to approve their representation by the City Counselor's Office.

8. Defendants therefore respectfully request that the Court grant an extension of time of 30 days, up to and including October 5, 2018, within which to answer or otherwise plead.

9. Counsel for Plaintiff consents to this motion.

10. This motion is made in good faith and not for the purpose of undue delay.

WHEREFORE, Defendants Linhorst, Karnowski, and Shaw respectfully request that this honorable Court grant them an extension of time up to and including October 5, 2018, within which to file a responsive pleading.

Respectfully Submitted,

JULIAN BUSH
CITY COUNSELOR

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CERTIFICATE OF SERVICE

I hereby certify that on September 4, 2018 the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system on all counsel of record.

/s/ Abby Duncan